

COVINGTON & BURLING

EX PARTE OR LATE FILED

1201 PENNSYLVANIA AVENUE NW WASHINGTON, DC
WASHINGTON, DC 20004-2401 NEW YORK
TEL 202 662 6000 LONDON
FAX 202 662 6291 BRUSSELS
WWW.COV.COM SAN FRANCISCO

JENNIFER A. JOHNSON
TEL 202.662.5552
FAX 202.778.5552
JJOHNSON@COV.COM

January 29, 2003

Bv Hand Delivery

ORIGINAL RECEIVED

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

JAN 29 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: **Ex Parte Notice – MB Docket No. 02-277 and MM Docket Nos. 01-235, 01-317 and 00-244 (2002 Biennial Regulatory Review of the Commission’s Broadcast Ownership Rules and Other Rules) and Public Notice DA 01-1264 (NASA Petition for Inquiry)**

Dear Ms. Dortch:

On January 28, 2003, representatives of the Network Affiliated Stations Alliance (“NASA”) met with members of the Commission and their staff regarding the above-captioned proceedings. Specifically, NASA representatives discussed the contents of its January 2, 2003, comments in MB Docket No. 02-277 regarding the 35% national television ownership cap (filed jointly with the National Association of Broadcasters), including the findings of the economic study and survey of affiliates included in that filing. In addition, NASA representatives discussed the positions set forth in its written submissions in the NASA Petition for Inquiry proceeding (DA 01-1264) regarding the appropriateness of a declaratory ruling on provisions of network contracts that are inconsistent with FCC rules and the Communications Act

The January 28th meetings were with Commissioner Copps and his Legal Advisor Alexis Johns; Commissioner Abernathy and her Legal Advisor Stacy Robinson; Commissioner Martin and his Legal Advisor Catherine Bohigian; and Commissioner Adelstein and his Legal Advisor Sarah Whitesell. The NASA representatives who attended all of these meetings were NASA counsel Jonathan Blake and Jennifer Johnson of Covington & Burling and the following members of the **NASA Steering Committee**: Alan Frank, Chair of the NASA Steering Committee and President of Post-Newsweek Stations, Inc.; David Barrett, President of Hearst-Argyle Television, Inc. and past Chair of the ABC Affiliates Association; and John Tupper, President of Prime Cities Broadcasting Inc. and Chair of the Fox Affiliates Association. Sandy Wilson, Vice President-Policy Counsel at

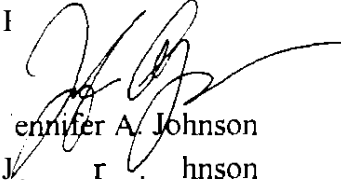
Ms. Marlene H. Dortch
January 29, 2003
Page 2

ORIGINAL

Cox Enterprises, Inc, also attended the meetings with Commissioner Abemathy, Commissioner Martin and Commissioner Adelstein.

Pursuant to Section 1.1206(b) of the Commission's Rules, an original and 10 copies of this letter (two copies for each docket number) are being submitted to the Secretary's office, with copies to those at the FCC that attended the meetings. Copies of this letter also have been provided to Mania Baghdadi, Linda Senecal, and Qualex International, as specified in the Commission's Notice of Proposed Rule Making (MB Docket No. 02-277) and in Public Notice DA-OI 1264.

Please direct any questions regarding this notice to the undersigned.

I 
Jennifer A. Johnson
Director

cc: Commissioner Kathleen Q. Abemathy
Commissioner Jonathan S. Adelstein
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Catherine Bohigian
Alexis Johns
Stacy Robinson
Sarah Whitesell
Mania Baghdadi
Linda Senecal
Qualex International